

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

MOTION TO COMPEL SUPPLEMENTAL DISCOVERY

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Civil Rule 37, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”), by and through their attorneys, hereby move to compel supplemental discovery from Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A.J. Dwoskin & Associates, Inc. (“Defendants”). The grounds in support of this motion are set forth in the accompanying Memorandum of Law.

Pursuant to Local Civil Rule 37(E), on August 8, 2019, counsel for Plaintiffs and counsel for Defendants met and conferred by telephone in a good faith effort to resolve the issues presented herein without the need for a motion. The parties were unable to resolve their dispute.

DATED this 9th day of August, 2019

Respectfully submitted,

/s/ Nady Peralta

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of August, 2019, I filed the foregoing Motion to Compel Supplemental Discovery electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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